MEMORANDUM

TO: The Commission
FROM: Office of the Commission Secretary
DATE: August 1, 2022
SUBJECT: AO 2022-14 (Google LLC) (39 Comments)

Attached are 39 comments on AO 2022-14 (Google LLC)

Attachment
Absolutely no. I would change my email to someone else if this happens.

Sent from my iPhone
Good day,

Please register my comment on this matter: I do NOT want political campaigns, interest groups, action committees, or any other entities able to bypass my spam filter just because of who they are. No entity sending out mass emails should get through my spam filter unless I actively mark them as "Not Spam." I don't care if it's the Republican National Committee, Democratic National Committee, National Rifle Association, Natural Resources Defense Council, Roman Catholic Church, Freedom From Religion Foundation, Heritage Foundation, American Civil Liberties Union, or the Fraternal Order of the United Brotherhood of Something I Probably Couldn't Care Less About.

I don't give a rat's patootie if the RNC thinks they're being discriminated against.
1) Let them prove it. The NC State study used 102 email accounts...hardly a statistically valid sample size. Furthermore, they did not control for whether campaigns were using the Google-supplied 'best practices' that are readily available online.

1a) For example, Google recommends using the same sender email address on every bulk email. abc123@political.com and def456@political.com are different email senders to a spam algorithm. Email spoofing programs routinely use different email addresses ostensibly from the same domain so that telling the filter "Mark abc123@political.com as Spam and block all future emails from that sender" won't stop their emails - you'll have to implement a filter to block ALL emails from political.com - which may be a legitimate domain you actually do want to receive emails from.

1b) Next, Google recommends using a Domain Keys Identified Mail (DKIM) digital signature, which lets receiving email servers verify a message actually came from the organization in the "From" address.

1c) There are additional recommendations. While not a short list of only a handful of items, it is not excessively long to anybody experienced with information technology management and NONE of the items are difficult to implement. Furthermore, any entity spending hundreds of thousands or millions of dollars on advertising, lobbying, etc., should be considered at fault (rather than Google) if they don't hire a staff member who understands how to implement these guidelines.

1d) Without data on whether the entities being blocked by Google were implementing Google's best practices, any analysis saying "Google's algorithm is biased against conservatives" is not credible. And since Google's 'best practices' may be different from Yahoo's or Outlook's 'best practices,' even data showing those organizations were following Yahoo and/or Outlook's 'best practices' is insufficient.

2) Even if Google staff is ACTIVELY biasing against conservative organizations' mass emails - as in, writing actual computer code with the intent of making those emails more likely to be filtered as spam - there is no regulatory leg for conservatives to stand on. Contrary to Senator Grassley's argument, Google is not equivalent to the U.S. Postal Service. The USPS is
obligated to provide service to everyone in America, regardless of where they live, for at least one mail product, at a uniform price. (Hence why overnight mail is not available to all areas of the country - the USPS is only obligated to provide one mail product.)

2a) Google is a private sector entity and has no obligation to provide its email service to anybody. Not only that, individuals must actively choose to sign up for Gmail. They don't have to sign up for Gmail as there are innumerable email services, including many that offer a basic tier of "free" service. I put "free" in quotation marks because there's no such thing as "free" - if a web service isn't charging you for a product then YOU'RE the product...or, rather, your data is. It's no secret that Google uses the information gleaned from Gmail accounts to sell targeted advertising to users.

2b) When it comes to FCC regulation, except for Google Fiber where Google provides actual internet service, Google is not a "common carrier" unless you are drunk, stoned, and squinting hazily sideways at the United States Code...or you're a nutcase pissed off that "Big Tech" is filtering your content when you say things like "vaccines don't work" or "vaccines are conspiracy to control the population" or a partisan hack pissed that your emails keep ending up in spam folders. 47 U.S.C. §153 defines "common carrier" as "any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier."

Unless I'm much mistaken, the "energy" running down fiber optic and copper cables is not supplied by Google's Gmail servers, but by an Internet Service Provider's (ISP) communications infrastructure. Emails are just the 1s and 0s riding on the ISP's energy.

2c) Nor can conservatives claim any violation of their civil rights by Google. The Civil Rights Act of 1965 defines a "public accommodation" in 42 U.S.C. §2000a(b), which is too long to include here, and NONE of which can be interpreted to include an email service provider. Furthermore, the prohibition on discrimination involving public accommodations specifies discrimination due to race, color, religion, or national origin.

The Supreme Court has never held political affiliation to be a suspect class or quasi-suspect class. So even if conservatives argued "Google doesn't count as a public accommodation, but it's discriminating against us for our political beliefs," there is no legal protection for conservatives.

2d) There is no First Amendment protection even if Google were found to be actively discriminating against conservatives via coding in its spam algorithms. The 1A applies to public/government entities, not private sector corporations. Contrary to any conservatives' whining session rivaling a "Real Housewives" episode, Google is not actually an arm of the U.S. or any state government, or even the Democratic Party. So any claim that Google (or Facebook or Twitter) should be required to post whatever bloviating idiocy is vomited by any dingbat with a keyboard is laughable on its face.

3) Continuing in the same vein, even if Google software engineers were actively coding anti-conservative bias into spam filters, conservatives are free to switch to any of numerous competing services. Seeing as the NC State paper claims Yahoo and Outlook sent fewer mass mailings straight to spam, perhaps they can switch to those services? Nobody absolutely needs
a Gmail account. And the almighty "invisible hand" of the sacred free market that conservatives fetishize means that Google will change its practices if enough users/customers stop using Google's services. Of course, much like conservative Christians' knowledge of the Bible, overall conservative knowledge of Adam Smith's "An Inquiry Into the Nature and Causes of the Wealth of Nations" is limited to cherry-picked phrases, and their knowledge of Smith's "The Theory of Moral Sentiments" is often non-existent.

4) I could go on, but my wife is rolling her eyes and shaking her head in exasperation that I bothered to write this at all. I don't know why she seems surprised, I've been like this for as long as she's known me - which is over half our lives.

So, to sum up, count me as a definite "DON'T MESS WITH MY SPAM FILTER ALGORITHM."
My name is Earl Sorrels. I make these comments as an individual member of the general public with an email account through Google. I do not support the requested AO 2022-14 (Google).

Spam filters are there for a reason, however, the protections to the Gmail user recently added over the past few years were necessitated by a stream of false and dangerous rhetoric by the Republican Party. The filing for AO 2022-14 by Google maintains these protections, as stated, but proposes a reset for any campaign-related outreaches. This would allow already identified spam, identified by the entire user group of Gmail, to go right through to the Inbox, despite the efforts of many millions of users who have already sent this tripe to the electronic "circular file".

The option to have a one-button flush for these political ads, as presented in AO 2022-14, does not do justice to the choices already made by the vast majority of us Gmail subscribers. These intrusive reach outs by the sweaty palmed public servants have already been relegated to the spam folder. Google is merely advancing our wishes from previous choices by the subscribers of their product, a personal email account. This is not a free account. We give up certain data/privacies to have access to the email account.

Shame on those whiners who have used their public offices to intimidate a public company providing a private service to millions of customers. All because the public has grown weary of the platform presented – fear of whatever needs to be feared at the moment to pump up support, homophobia, lack of tolerance for certain Americans based upon race, imposition of the Christian faith on all Americans, especially over science, a general disregard for civility and law abiding and utter amnesia of the empathy we maintain for each and every American from every state. This includes the immigrants that they consider less-than human, despite being human beings, upon even a casual gaze. To those in the current manifestation of the Republican Party, that I was a member of for decades until it’s fowling, stop whining and start changing back into something that represents Americans.

Despite the thoughtful construction of the Google proposal outlined in AO 2022-14, I have to say that I do not support it. It is handing a do over to placate a faction within our government, threatening Google with spoken and unspoken consequences, to give them another shot at fundraising because they are failing to convince the voting public of their worthiness. This would moot Google’s legal concern of in-kind contributions. Just let this stinking fruit die on the vine.

Thank you for the opportunity to share my thoughts and for your service to all Americans.
I implore you to reject AO 2022-14, Google's request to remove spam protections for political emails. Such a policy would degrade the user experience and flood a currently useful tool with garbage. The FEC's approval of such a request would be seen as a political act to benefit a certain party that has lobbied Google hard for this policy. Please maintain the integrity of GMail.

Thank you.
After reading the details of the proposed Google plan to allow political email to bypass spam filters, I'm writing to express my strong opposition.

Political fundraising emails can follow the same rules as any other emails - if they are unsolicited or deceptive, or flagged by a significant number of users as such, then they should be sent to the spam folder.

Users who want these emails can mark them as not spam, as with any other email. There is nothing about political fundraising emails that justifies special treatment, and tools already exist for legitimate fundraising emails to avoid spam filters.

Considering the abusive and frequently downright fraudulent language and tactics used by many political fundraising emails, these are the last category I would like to see exempted. In fact, I would like to see them regulated in the same way as corporate solicitations are regulated by the CFPB.
This proposal is such an obviously terrible idea that only a politician could devise it. Or, perhaps, a group of politicians so ancient and out-of-touch with normal human Americans that they have no inkling of what sort of impact this would have on everyday people. How often does an octogenarian senator peruse his or her own gmail account tabs and spam folders? Please. They're clueless to the fact that imposing this program would do nothing more than create more nuisances in the lives of the people whose best interest they are supposed to represent. Say no to this.
Dear Commissioners,

After scouring the FEC website in vain for a way to comment directly on AO 2022-14, requested by Google, I am turning to a direct email in hopes of reaching you.

It concerns me greatly that elected officials and political operatives are trying to circumvent spam filters. Not only do I consider such emails spam, unless specifically opted into, I find it even more offensive that they want to (again) place themselves above the law that applies to everyone else. When the do-not-call registry started I immediately signed up, only to still be bothered with campaign calls because they are exempt. There is not even a choice to opt out of political calls.

If Google is allowed to let political emails bypass spam filters, many mailboxes will explode. Some politicians don't stop at the occasional email, they blast out many missives a day, often filled with misinformation and hateful rhetoric. In other words: spam. Email addresses are constantly shared or sold without regard to the wishes of the addressee. I, for one, am happy that an algorithm screens out a majority of the spam directed at me and would like that to continue to include unsolicited political emails.

Political campaigns are, just like businesses, trying to sell a product. Don't afford them special treatment.

Respectfully,
Clasina Van Velzen-Stup
I am commenting on the proposed rule to exclude spam from Google's spam filter.

Please do NOT pass this rule. I do not want my mailbox inundated with this type of email.

Spam mail is not blocked. It is just sent to a different folder. Anyone who wants to read their spam mail can already do so. The proposed rule changes is not needed or wanted. It would accomplish nothing except make email management a misery for millions of people.

Joyce Hammer
Google's request is tantamount to massive political sway. Please do not approve!
Spam is spam, whether it’s origin is political in nature or not.

Please do not allow this pilot project to proceed. I appreciate the fact that Google’s spam filter spares me from being inundated in the daily deluge of unsolicited, unwanted emails. I do not want to wade through them myself, manually unsubscribing and filtering them out, I believe this is an unreasonable burden to place on users.

Allowing any entity soliciting money to evade spam filters is directly exposing vulnerable people to exploitation. This is precisely the purpose of a spam filter.

If the GOP would like to be more successful in their fund raising efforts, I suggest they be more diligent in adhering to existing best practice for composing and delivering bulk email messages, which will in turn make it more likely they land in a recipient’s inbox. Or perhaps make their message more compelling?
DO NOT approve this plan to exempt political email from spam detection. Nobody other than political fundraisers want this. The argument by one of your commissioners that people can just "train their spam filters" is specious. First, it requires *me* to expend effort to train my system to rid itself of spam I never wanted to begin with. Second, it allows political consultants to use the same techniques as spammers to evade the trained filters, which is of course exactly the capability they want.

Steve Corman
Chandler, Arizona
I read AOR 2022-14 with interest, then dismay. Please, don't make it easier for political spam to evade gmail's spam filters.

Please do not facilitate this nationwide increase in politispam. If people want to read political mass mailings, they can read their gmail "Spam" folders, and the "Updates" and "Promotions" tabs. Then they can mark those emails as "not spam" or "file me in primary inbox". But please leave the rest of us alone.

Kind regards,
C. Park
Please don't let Google talk you into exempting campaign and other communications from politicians from spam filters. They should be treated like any other mass emails that people mark as spam. Tech companies already allow politicians too many exemptions from the rules they apply to everyone else. If politicians send spammy emails, they should expect them to be caught by spam filters. I switched to Gmail because its spam filters are better than the competition. Don't break it just because some politicians complained to Google management that Gmail users don't want to send them more money.

Regards,
Alicia Fernandes
Leesburg, VA
Absolutely no. Google should NOT allow political fund raising emails to bypass spam filters.

Dean Della Pella
Harvest, AL
HI,

I get hundreds of spam emails every day. Please do not change the rules to allow political emails to get past the spam filters.

Thanks,

Evan Rogers
To Whom it May Concern,

I used to be afraid to answer my telephone which rang incessantly, particularly around and after dinner time. I recall adding my name to a do not call list. Nothing changed; the calls kept coming.

I implore you to not allow even more unwanted political adds filling my inbox. I need less political adds not more. I want the filters to take as much of that special interest garbage away as possible.

Thank you for your consideration.

Angelo J. Fichera
I get 5-10 emails/day from political fundraising entities (and now texts too). I don't care what party they are from, I DON'T WANT THEM. Do whatever you have to do to LIMIT delivery of such messages.

Google's spam algorithms should remain as they are. They are providing a public service. If I want someone's emails, I can subscribe. If I don't subscribe, I don't want them. Simple.

Regards,
Pamela Cornell

P.S. YOU DO NOT HAVE PERMISSION TO USE MY EMAIL FOR ANY PURPOSE OTHER THAN TO INFORM ME ABOUT THE LEGISLATION IN QUESTION.
Please do NOT exempt political spam from the filters that help keep my inbox free from this garbage. It would be a waste of my time and resources, and it would privilege a category of spammers who have abused the American public for years. Stop the grifters and stop the spam.

Mark Traugott
Please tell Google that it can't exempt political/campaign emails from spam filters. Political spam is extremely annoying and time wasting, and making it harder for people to avoid these emails would harm the public.

Sincerely,

Kathleen Lu
NO! NO! NO!!! A THOUSAND TIMES NO!

DO NOT ALLOW GOOGLE TO CLOG UP MY EMAIL ADDRESS WITH POLITICAL ADS!

PLEASE DO NOT ALLOW.

Sincerely
Cathy Ross

Get Outlook for Android
I absolutely do not support allowing Google (or any other company) to relax filters on emails from politicians or political groups.

Spam is spam. Among its many negatives, given the misleading requests for funds issued by a number of candidates and groups in recent years, allowing even more such unscrupulous emails through will do a disservice to those individuals who are unable to recognize exactly what they’re agreeing to send money to and how often their accounts will be withdrawn.

Ultimately, politicians are funded by big business in the interest of big business and not in the interest of the average citizen. Increasing political spam will do a disservice to our country.

Thank you for this opportunity to comment,

Nancy Happel
To the FEC Commission:

Please vote against AO 2022-14. I don't want my inbox filled with pleas for money from political campaigns. I have all the opportunity I need to learn about and support campaigns of my choice without being inundated with spam from campaigns.

Further, I am concerned that Google's request seems to be the result of GOP pressure. I want my spam filters to protect me against money-grubbing politicians, not cater to their endless seeking of cash.

Thank you,

Sidney Maskit
Los Angeles, California
I don't want fundraising emails to bypass my spam filter! Corporations and oligarchs can buy my elected officials, representative democracy is dead in the US.

If it comes through and I report it as spam, will it continue to come through?
Do not send unsolicited email to my account.

I waste enough time already marking unsolicited messages as spam.

I also view unsolicited email as a potential phishing scam and deal with it accordingly.

Thank you.
I am writing to encourage the FCC to reject Google’s idea of not subjecting political fundraising emails to normal spam filters. There are so many examples of un-American conduct recently, and this makes that situation worse. If a political lobbying or fundraising email is determined to be Spam, maybe the authors should review what they are sending rather than make special exceptions for them. Allowing the exceptions for political emails and not for all emails is incredibly biased and gives preferential treatment to certain organizations over others, based on political affiliations.

Please, do not allow Google to do this.

-Kevin Moore
To Whom it May Concern:

In reference to AO 2022-14, please DO NOT allow Google to let political junk Mail bypass the spam filter. This is a terrible idea.

Sincerely,
Rev. Dr. Madelyn Campbell

Sent from my iPhone
DO NOT ALLOW THIS TO HAPPEN
* Opposing the proposal as written.

Permitting unsolicited electronic bulk mail requests from political actors is an involuntary contribution from Gmail users. Google's statement that the Gmail service is free for its users is inaccurate. As Google admits against interest, Gmail users are subjected to advertisements and also may subscribe to the service. Moreover, data transmission and storage costs are significant.

Political electronic bulk mail is distinguishable from physical bulk mail. Electronic mail is receiver pays (via advertisements or subscription). Physical mail is sender pays (via stamps or permits).

Therefore, this is not without cost to the recipient. Google reports an immense profit. It is undesirable and unseemly to pay for advertisements or subscription and then receive more bulk advertisements.

Support a requirement that all political and other bulk senders be opt-in. Support that for every bulk message the requestor must meet reputational thresholds and ensure that their messages are secure, filterable, and follow best practices for the user experience, including for example

- "one-click" unsubscribe which enables a user to efficiently opt out of future communications
- approaching and following unsubscribe requests within 2 hours, which respects the user's choice,
- ensuring that all links in the message can be scanned by Google for phishing and malware detection, which helps to protect the user from harmful content.

At our residence, the US mailbox is positioned near the recycling bin. Bulk mail generally goes directly into recycling without being viewed. Sadly, receiver has to pay for recycling (via taxes). Likewise, we expect unsolicited electronic bulk mail to go directly to the spam folder is automatically deleted, recycling storage. This is helpful both in terms of transmission and storage costs.

I have been a Gmail user for many years.

I am also a Google Fi customer.

Don't be evil.

William Allen Simpson
Ann Arbor, MI
Please do NOT allow this request. Unsolicited Political emails should be considered spam. They should not be allowed to clog our in boxes.

Sarahbeth Grossman
DO NOT DO THIS. I get too many stupid, shitty, political emails begging for money I don't have to give already.

--Lynsey
Dear FEC Board of Commissioners:

The loud and unfounded accusations of partisan bias levied against Google by certain politicians are quite clearly the reason behind this terrible idea.

Please do not allow the fact that the likes of Chuck Grassley and Marco Rubio can't be bothered to learn how email works persuade you to grant them unfettered access to the nation's inboxes.

Please do not allow this program.

Best regards,
Paul
In our post Citizens United world allowing political spam to bypass spam filters will simply give the wealthy an unfair advantage and at our expense. The only thing worse than this proposal from Google is the fact that we have to beg gov't agencies to do the right thing by us, having no faith in a system where the 1% reign supreme.

Tammy L
Please do not let this pass. I’m already overwhelmed by email lists I didn’t sign up for. Many are political and I can’t unsubscribe fast enough.

Sarah Caine
Don’t allow political messages to bypass spam filters — don’t allow Google’s proposal to allow political messages to bypass spam filters. They want to do it for MONEY (GREED) ! Not for the welfare of Americans. Stop Google.

Dana Ivey

Want what you have.
Be who you are.
Do what you can.
I do not want political ads to be allowed to bypass my spam filters. Google can go jump. Do not cave to this craven request for Google to garner even more ad money from stuffing my inbox with junk I don't want to see. Each consumer can choose for herself which items can bypass spam filters. Interested parties will let the ads through.

This is not anything the FEC needs to support, unless your mission is to turn even more people off the political process. I don't think that's your purpose, but hey, I'm just a voting citizen who pays the bills.

Thanks in advance for what I hope against all evidence to the contrary that the FEC will make a sensible decision.

Deborah Frazier
Port Angeles, WA 98362
I object to Google's plan to allow political messages to avoid the spam box. Please do not approve it.

David Pyle
Google should continue using algorithms to filter political campaign emails. Political campaign spam is a menace. I am against Google's plan for a pilot program that would stop Gmail algorithms from sending campaign emails from political committees to spam. Continue filtering political spam!
Absolutely please do not make an exemption for political spam in email inboxes. Our private inboxes are already flooded with spam and political messages, limiting them makesFormControl as well. Consider all the methods available for communicating a flurry of fractured information instead of just ignoring the problem and flooding their inboxes with political content.

Chris Canfield
Cell: 617.417.0006  |  Web: chriscanfield.net
The proposal of Google in relation to having "authorized candidate committees" the ability to send email that is given direct access to a recipient's inbox is not a good idea.

It is unnecessary and will not work. It will result in an avenue for spam and other sorts of malicious email to be opened.

If the GOP wants their email solicitations to not be filtered as spam they can follow Google's rules and write email that is not spam.

Charles Daniels